

REMARKS

The foregoing amendments are made for purposes of clarification.

On page 15 of the response submitted on January 3, 2007, the area of the holes was calculated incorrectly. The total area of the holes should have been 98 mm². As a result, only about 0.056% of the plate would be provided with through holes. This is much smaller than described in the response on January 3, 2007.

In addition, *Umotoy* was described as teaching the use of o-rings, when in fact *Umotoy* teaches away from the use of o-rings. The last paragraph of page 18 should read as follows:

Applicants submit that *Yuda* and *Umotoy* operate sufficiently differently from each other so that one of skill in the art would not be motivated to combine the references, as proposed by the examiner. The mere fact that *Umotoy* teaches the use of a bonding to avoid the use of o-rings does not present a suggestion to use such bonding in every plate. As stated in § 2143.01 of the Manual of Patent Examining Procedure, the mere fact that references can be combined or modified is not sufficient to establish *prima facie* obviousness. Motivation for the modification or combination must be present in addition to mere technological possibility. In this case, the Examiner has failed to provide a motivation for using the bonding of *Umotoy* in the system disclosed by *Yuda*. This is particularly true since *Yuda* does not identify any problems with the plates or gas injectors. Accordingly, since *Yuda* does not identify any problems with the plates, there would not be any motivation to “avoid the use of o-rings” as alleged in paragraph 6 of the Official Action. Accordingly, as set forth in the attached Declaration of Mr. Nogami, there would be no reason to modify *Yuda* based on *Umotoy* as alleged in the Official Action.

Applicants apologize for any inconvenience caused by the above-mentioned errors.

In the event that there are any questions concerning this response, or the application in general, the Examiner is respectfully urged to telephone the undersigned so that prosecution of the application may be expedited.

Respectfully submitted,

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Date: February 8, 2007

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